

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

Nefertiti Gilbert et al.,)	
)	
Plaintiffs,)	Case No: 1:25-CV-00421-DDD-JPM
)	
vs.)	Judge: Dee D. Drell
)	
Harris County, Texas, et al.,)	Mag. Judge: Joseph H. L. Perex-Montes
)	
Defendants.)	

**PLAINTIFFS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND
TO DEFENDANTS' MOTIONS TO DISMISS**

Plaintiffs, through their undersigned attorneys, bring this unopposed motion for an extension of time to respond to the motions to dismiss Plaintiffs' complaint, which have been filed by Defendants Sheriff Ed Gonzalez (ECF 27) and Harris County (ECF 28). In support of their motion Plaintiffs state as follows:

1. Plaintiff filed their complaint on April 2, 2025. See ECF 1.
2. Defendants Gonzalez and Harris County filed their Motions to Dismiss Plaintiff's Complaint on May 27, 2025. See ECF 27, 28.
3. On May 27, 2025, this Court set a motion hearing schedule for Gonzalez and County's motions to dismiss, in which Plaintiffs were given 21 days or until June 17, 2025, to respond. See ECF 29.
4. The LaSalle Defendants were granted an extension of time to respond to Plaintiffs' complaint until July 21, 2025. See ECF 26.
5. Plaintiffs anticipate that one or more of the LaSalle defendants will move to dismiss Plaintiffs' complaint through a Rule 12 motion as well. Plaintiffs seek to align their responses to

the Harris County / Gonzalez dismissal motions with their responses to any motions to dismiss filed by the LaSalle defendants.

6. Plaintiffs respectfully submit that consolidating the briefing on the defendants' dismissal motions will promote efficiency, as the Court will be able to consider consolidated arguments regarding the allegations in Plaintiffs' complaint and the legal basis for them. Consolidated consideration will be of particular value to the Court in this case because Plaintiffs' allegations against Harris County and Sheriff Gonzalez are intertwined with their allegations against the LaSalle defendants. Plaintiffs further submit that consolidated briefing will protect Plaintiffs against the prejudice of doubling their work and previewing their arguments for the LaSalle defendants.

7. Plaintiffs have conferred with counsel for the defendants in this case, and are informed that the defendants do not oppose this request.

8. Plaintiffs are submitting a proposed order in conjunction with this request.

WHEREFORE, Plaintiffs respectfully request that the Court issue an order extending the time for Plaintiffs to respond to the motions to dismiss filed by Defendants Ed Gonzalez (ECF 27) and Harris County (ECF 28) to the deadline that is set for responding to any motions to dismiss filed by the LaSalle defendants. (Alternatively, if the LaSalle Defendants do not file motions to dismiss, Plaintiff requests that the deadline for responding to ECF 27 and ECF 28 be set as August 11, 2025)

Respectfully Submitted,

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